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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
ANTONNE M. JONES, :

Plaintiff, :

-against- :

07 Civ. 3648 (KNF)(HBP)
AFFIRMATION OF AMBROSE
WOTORSON AND VICTOR
DUNLOP IN OPPOSITION TO
DEFENDANTS' MOTIONS FOR
SUMMARY JUDGMENT

ROC-A-FELLA FILMS, INC., LIONS GATE :
FILMS, INC., DAMON DASH and :
SHAWN CARTER, :

Defendants. :

-----X

Victor Dunlop, Esq., of Dunlop & Associates, P.C and Ambrose Wotorson of the
Law Offices of Ambrose W. Wotorson, attorneys duly admitted to practice law in this
State and before this Court, affirm under penalty perjury that:

- a. We are counsel for plaintiff in the above styled-matter.
- b. This affirmation is submitted in support of Plaintiff's Opposition to
Defendants' Motions for Summary Judgment. Annexed herewith are
true copies of exhibits in support of Plaintiff's Opposition to
Defendants' Motions for Summary Judgment.

- Exhibit 1.** Library of Congress Copyright Office of the United States certification of “The Family” dated January 15, 1998. (Anderson Exhibit 7).
- Exhibit 2.** Junior Black Mob by Ernest Tron Anderson, registered: WGA West September 17, 1998. (Anderson Exhibit 4).
- Exhibit 3.** Memorandum from Mike Paseornek, President, LGF Productions to Damon Dash and David Feldman, Bloom Hergott, Diemer and Cook, and Eda Kowan, LLP dated June 1, 2000, regarding: Urban Film. (Plaintiff’s Exhibit 1). (LGF 001005-9).
- Exhibit 4.** Form PA For a Work of The Performing Arts, United States Copyright Office from Get Down Productions dated June 29, 2000. (Plaintiff’s Exhibit 22). (LGF 001011-1014).
- Exhibit 5.** Email from Peter Block to Mike Paseornek, Eda Kowan and BlueMusicProd@aol.com, dated May 9, 2001, regarding: Get Down/Lay Down (Plaintiff’s Exhibit 2). (LGF 000993).
- Exhibit 6.** Email from Chela Johnson to Peter Block dated October 24, 2001, regarding: State Property. (Plaintiff’s Exhibit 24) (LGF 000972).
- Exhibit 7.** Email from Mike Paseornek to Peter Block, Tom Ortenberg and Jennifer Morgerman dated December 11, 2001, regarding: State Property—new media marketing plan. (Plaintiff’s Exhibit 6). (LGF 000979-984).
- Exhibit 8.** Email from Abul M. Abbott to Tony Motzenbacker dated April 16, 2003, regarding: Abul M. Abbott’s address (Plaintiff’s Exhibit 7). (LGF 001140).
- Exhibit 9.** Facsimile from Abdul Malik Abbott to Tony Matzenbacker dated May 5, 2003, regarding: Contract “State Property” (Plaintiff’s Exhibit 8). (LGF 001142-1149).
- Exhibit 10.** Copyright Office of the United States Certification of “The Family” dated June 29, 2007. (Defendant’s Exhibit 6).
- Exhibit 11.** Affidavits of Samuel Brown dated November 14, 2007. (Defendant’s Exhibit 13).
- Exhibit 12.** List of Copyrights regarding Ernest Anderson at Alexis DiVincenti dated February 22, 2008. (Defendant’s Exhibit 3).
- Exhibit 13.** Letter from Ira Cure, Senior Counsel Writers Guild of America, East to Mark Tamoshunas, Esq. re: Jones v. Roc-a-Fella Films, Inc. 07-civ-3648

- Exhibit 14.** MySpace Printout regarding Tron Anderson dated February 29, 2008.
- Exhibit 15.** Expert Witness Report of Professor Robert Vianello, PhD dated March 10, 2008.
- Exhibit 16.** Subpoena of Ernest “Tron” Anderson dated March 11, 2008 (Anderson Exhibit 1).
- Exhibit 17.** Email from Eanderson149@sprintpcs.com on behalf of Tron to Cearley, Toni (Phila) dated March 11, 2008, regarding: The Affidavit (Anderson Exhibit 8).
- Exhibit 18.** IMDb (Internet Movie Database) printout regarding “Independence Day” dated March 11, 2008. (Exhibit P-2).
- Exhibit 19.** IMDb (Internet Movie Database) printout regarding Ernest “Tron” Anderson dated March 11, 2008. (Exhibit P-3).
- Exhibit 20.** IMDb (Internet Movie Database) printout regarding “Men in Black” dated March 11, 2008. (Exhibit P-4).
- Exhibit 21.** IMDb (Internet Movie Database) printout regarding “Bad Boys” dated March 11, 2008. (Exhibit P-5).
- Exhibit 22.** IMDb (Internet Movie Database) printout regarding “Hitch” dated March 11, 2008. (Exhibit P-6).
- Exhibit 23.** “Get Down or Lay Down” Junior Black Mob 128514. (Anderson Exhibit 5).
- Exhibit 24.** Criminal Record of Ernest “Tron” Anderson.
- Exhibit 25.** Criminal Record of Thomas Lawson.
- Exhibit 26.** Criminal Record of Samuel Brown.
- Exhibit 27.** Letter of Samuel Brown dated November 14, 2007.
- Exhibit 28.** Second Affidavit of Samuel Brown dated May 7, 2008.
- Exhibit 29.** DVD: Menace to Society.
- Exhibit 30.** Withdrawn.
- Exhibit 31.** Withdrawn.

Exhibit 32. Affidavit of Antonne Jones.

Exhibit 33. Deposition Excerpts of Michael Paseornek.

Exhibit 34. Deposition Excerpts of Damon Dash.

Exhibit 35. Deposition Excerpts of Ernest “Tron” Anderson.

Exhibit 36. Deposition Excerpts of Antonne Jones.

Dated: Brooklyn, New York
May 13, 2008

Respectfully Submitted,
DUNLOP & ASSOCIATES, PC
By: /s/
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